

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 1997

RECEIVED  
FEB 3 4 35 PM '98  
Docket No. R97-1  
OFFICE OF THE CLERK

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS THOMPSON  
(USPS/OCA-T100-45-52)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Thompson: USPS/OCA-T100-45-52.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
February 3, 1998

USPS/OCA-T100-45 . Please refer to your response to USPS/OCA-T100-11(d)2. Please confirm that your response means that by replicating the Postal Service's results, you have verified the Postal Service's underlying distribution keys. If you do not confirm, please explain fully.

USPS/OCA-T100-46. Please refer to your response to USPS/OCA-T100-15b-c. Please confirm that Attachment I to USPS Witness Patelunas's response to USPS/OCA-T5-3 provides the order in which the Postal Service's model execution produces the various files. If you do not confirm, please explain fully.

USPS/OCA-T100-47. Please refer to your response to USPS/OCA-T100-15d-f which contains the following statement: "I began by accepting the Postal Service's Manual Input Requirement data." Please confirm that you did not accept any data other than those contained in the Postal Service's Manual Input Requirement that appears as Workpaper A-1 accompanying the testimony of Witness Alexandrovich, USPS-T-5. If you do not confirm, please provide a complete list of all additional Postal Service data you accepted and provide complete documentation to the Postal Service's source of that data.

USPS/OCA-T100-48. Please refer to your response to USPS/OCA-T100-17b which contains the statements: "for FY 97, I used both the USPS library references H-4

and H-6 to prepare the “ripple” instructions needed to replicate the Postal Service data. See OCA-LR-6 at 10-12.” Please provide a complete explanation of how the information shown in OCA-LR-6 at 10-12 was used with USPS library references H-4 and H-6. In your answer, please use an example from OCA-LR-6 at 10-12: the component number from OCA-LR-6 from 10-12, the corresponding treatment in USPS library references H-4 and H-6, and how this treatment is implemented in OCA’s cost model.

USPS/OCA-T100-49. Please refer to your response to USPS/OCA-T100-17b. Did you generate every specific page of the Commission’s model? If not, please specifically which printouts you generated.

USPS/OCA-T100-50. Please refer to your response to USPS/OCA-T100-25(b), where you state “I did not know what function the “nk” statement performed.” Do you now know what function the “nk” statement performs? If so, please explain in detail.

USPS/OCA-T100-51. Please refer to your response to USPS/OCA-T100-25(d)3. The original question sought to confirm the status of pre-final program executions in this docket, as opposed to what could happen in the future. Therefore, in terms of the program executions of the OCA’s cost model in this docket, please confirm that all program executions prior to the final one are lost and cannot be viewed in BY96LO.LR or elsewhere in OCA-LR-4.

USPS/OCA-T100-52. Please refer to your response to USPS/OCA-T100-25(f)3 containing the following statement: "[I]f I removed a statement and the program ran successfully, I assumed the component with a zero value generated the error message." Is it your testimony that the Commission's cost model's integrity is maintained if statements are removed to eliminate processing errors? If your response is anything other than an unqualified affirmative, please fully explain how integrity is maintained.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
February 3, 1998